

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re: : Chapter 11
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ZEN JV, LLC, *et al.*,¹ : Case No. 25-11195 (JKS)
:
Debtors. : (Jointly Administered)
:
: **Re: Docket Nos. 380, 397, 398, 401 403 & 478**
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**CERTIFICATION OF COUNSEL REGARDING REVISED FIRST OMNIBUS
ORDER AWARDING INTERIM ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES**

The undersigned hereby certifies as follows:

1. In accordance with the *Order Pursuant to 11 U.S.C. §§ 331, 330, and 105(a) and Fed. R. Bankr. P. 2016 (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, and (II) Granting Related Relief*, dated July 31, 2025 [Docket No. 258] (the “**Interim Compensation Order**”), Cole Schotz P.C., Latham & Watkins LLP, Richards, Layton & Finger, P.A., AlixPartners, LLP and M3 Advisory Partners, LP (the “**Applicants**”) filed their interim fee applications [Docket Nos. 380, 397, 398, 401 & 403] (the “**Interim Applications**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

2. Pursuant to the Interim Applications, objections to each of the Interim Applications, if any, were to be filed and served no later than the objection deadline set forth on each of the Interim Applications in accordance with the Interim Compensation Order, the last of

¹ The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

which expired on October 21, 2025. The Professionals received no objections or other responses to the Interim Fee Applications.

3. On October 24, 2025, the above-captioned debtors and debtors-in-possession (the “**Debtors**”) submitted to the Court under certification of counsel a proposed form of omnibus order approving the Interim Applications (the “**Initial Proposed Order**”). *See* Docket No. 478.

4. Following submission of the Initial Proposed Order, the Court made certain requests and inquiries with respect to the Interim Applications of certain Applicants. The requests and inquiries were addressed by, among other things, agreed upon reductions by certain Applicants, which are reflected in a revised form of Initial Proposed Order (the “**Revised Proposed Order**”). A copy of the Revised Proposed Order is attached hereto as **Exhibit A**. For the convenience of the Court and all parties in interest, a blackline comparison of the Revised Proposed Order marked against the Initial Proposed Order is attached hereto as **Exhibit B**.

WHEREFORE, the Debtors respectfully request that the Revised Proposed Order, substantially in the form attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: November 12, 2025
Wilmington, Delaware

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